
**TECHNICAL REVIEW DOCUMENT
FOR
OPERATING PERMIT 95OPCY005**
to be issued to:

Mull Drilling Co.
Sorrento Compressor Station
Cheyenne County
Facility ID 0170005

Geoffrey D. Drissel Review Engineer
Revised for Renewal April 15, 2008

1. Purpose

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued September 1, 1997. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted March 29, 2007. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

2. Source Description

This facility is a natural gas compressor station, classified under the Standard Industrial Classification of 1311, which processes gas to remove liquids and moisture and then reinjects it into the producing reservoir. The facility is located in a flat rural area 6 miles North and 6 miles West of the city of Kit Carson in Cheyenne County, Colorado (NE Section 5, T 14S, R49W). The nearest major road is Highway 40 which is 6 miles South of the facility. Two houses are located within 1 to 2 miles of the compressor station. The state of Kansas has been designated as an affected state located within 50 miles of the facility. There are no federal Class I areas within 100 kilometers of the plant. The area in which the plant operates, Cheyenne County, is designated as attainment for all criteria pollutants.

The source is considered to be a minor source (Potential To Emit (PTE) < 250 Tons Per Year (TPY)) for purposes of the Prevention of Significant Deterioration (PSD) program. Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential To Emit (TPY)</u>	2005/2006
		<u>Actual Emissions (TPY)</u>
NOx	166.6	56.1
CO	143.4	90.7
VOC	37.9	20.1

Potential emissions are based upon the existing Colorado Operating Permit limitations. Actual emissions are based upon a Division facility inspection conducted in June of 2006.

3. Discussion of Modifications Made

Source Requested Modifications

The source requested that the Fugitive VOC (S007) limit be raised from 10.0 tpy to 16.0 tpy.

The source also requested during the public comment period that the regulation conflict regarding the color of the condensate storage be resolved. The Division subsequently incorporated into Condition 5.3 the stipulation that compliance with COGCC Rule 804 would be considered compliance with the Regulation No. 7 tank coating requirement for this tank.

Other Modifications

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Mull - Sorrento Renewal Operating Permit. These changes are as follows:

Section I - General Activities and Summary

- The language in Condition 3.1 regarding the PSD status of the source was revised to reflect the current permit language.

Section II - Specific Permit Terms

- The language in Sections II.1 and II.2 regarding opacity and the use of natural gas as fuel was updated to reflect the current version.
- The language in Section II.4 regarding component count frequency was revised to indicate a five year interval starting with the initial Operating Permit.

Section III – Permit Shield

- The citation for the Permit Shield was updated to reflect the current reference.

Section IV - General Conditions

- The General Conditions were replaced with the current version.

- The Division has agreed to allow MDC to maintain necessary records in a computerized form as requested in its July 2004 letter.

Appendices

- Appendix B and C were replaced with revised Appendices.
- The EPA addresses in Appendix D were corrected.